



March 13, 2020

VIA ECF

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Hon. Vera M. Scanlon
United States Magistrate Judge
United States District Court for the
Eastern District of New York
225 Cadman Plaza East, 1214 South
Courtroom 13A – South Wing
Brooklyn, NY 11201

Re: *Monadnock Construction, Inc. v. Westchester Fire Ins. Co. / Westchester Fire Ins. Co. v. Glasswall, LLC, et al.* Case No. 1:16-cv-00420-JBW-VMS

Dear Judge Scanlon:

We represent Third-Party Plaintiff, Westchester Fire Insurance Company (“Westchester”), and jointly submit this Letter Motion with Third-Party Defendants, Glasswall, LLC (“Glasswall”), Ugo Colombo and Sara Jayne Kennedy Colombo to request an extension of deadlines for discovery and dispositive motions. This is the parties’ first request for such an extension.

The Court’s December 11, 2019 Order set the following deadlines:

- All discovery to be completed by 3/13/2020;
- On or before 3/13/2020, the Parties will file a joint status report letter confirming that discovery is complete;
- On or before 4/10/2020, the Parties will initiate any dispositive motions in accordance with the Individual Rules of the District Judge.

The deposition of a witness from Westchester already occurred on March 9, 2020, in Philadelphia. The depositions of Mr. and Ms. Colombo, however, could not be scheduled until May, with Glasswall also being deposed at that time for efficiency. The parties agree that all three depositions will occur by May 29, 2020, and be held at Cozen O’Connor’s Miami offices. The current preferred dates are May 7 & 8 or May 14 & 15, but final dates have yet to be set. The parties also believe that holding these depositions in May is preferable given current health concerns. Accordingly, the parties propose the following amended schedule:

- All discovery to be completed by 5/29/20;
 - On or before 5/29/20, the Parties will file a joint status report letter confirming that discovery is complete;
 - On or before 6/30/20, the Parties will initiate any dispositive motions in accordance with the Individual Rules of the District Judge.
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The parties respectfully request that the Court enter this amended schedule by so-ordering this Letter Motion.

Respectfully,

COZEN O'CONNOR

/s/ John J. Sullivan

By: John J. Sullivan